



**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IDA MAE WHITLEY,

Plaintiff,

v.

TAYLOR BEAN & WHITAKER MORTGAGE  
CORP.; ADVANCE LENDING GROUP, CORP.;  
GIL & GIL GROUP CORP., REAL ESTATE -  
LINCOLN; FAVIAN CARDENAS; BLUE  
HORIZON REAL ESTATE CORP.; and  
DOES 1-10,

Defendants.

*08 CV 3114 RCC*

Judge Castillo

Magistrate Judge Valdez

**FILED**

AUG 22 2008 TC  
Aug 22. 2008  
MICHAEL W. BOBBINS  
CLERK, U.S. DISTRICT COURT

**MOTION FOR EXTENSION OF TIME**

Defendants Favian Cardenas and Blue Horizon Real Estate Corp., pursuant to Fed.

R. Civ. P. 6(b), seek an extension of time in which to file their responses to the First Amended Complaint, and state in support thereof, as follows:

1. Defendants Favian Cardenas and Blue Horizon Real Estate Corp., (collectively "Movants" herein) have heretofore filed a response to the original Complaint in timely fashion.
2. Sidney Abelski, attorney of record for your Movants in the process of implementing the ability to comply with the requirement of electronic filing. However, as the date of the filing of the First Amended Complaint herein, August 11, 2008, the aforesaid electronic capacity had not been achieved.
3. Counsel for your Movants received the First Amended Complaint at approximately 1:00 p.m., on August 14, 2008.

4. The volume of material, and number of counts, presented by the First Amended Complaint, in combination with the existing case load of Abelski, precludes the ability to file a response on, or before, the 22<sup>nd</sup> of August, 2008.

5. An extension of time in which your Movants may file their response to the First Amended Complaint will facilitate the interests of justice without detriment or prejudice to the Plaintiff.

6. Counsel for the Plaintiff is out of the jurisdiction as of the time this motion is prepared and presented. Counsel undersigned verily believes, on the basis of past interaction with Al Hofeld, Jr., counsel for Plaintiffs herein, that said Hofeld would have no objection to the extension requested herein.

**WHEREFORE**, Favian Cardenas and Blue Horizon Real Estate Corp., respectfully pray for entry of an order providing as follows:

A. Providing to, and through September 1, 2008, in which to file their response to the First Amended Complaint.

B. For such other and further relief as this Court may deem equitable and just.



Sidney Abelski, Attorney for Favian Cardenas and  
Blue Horizon Real Estate Corporation

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